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May 17, 2021

**VIA ECF**

Honorable Brian M. Cogan  
United States District Judge  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: Zepeda Ochoa v. Famous Pizza of Jackson Heights Corp. et al, 21-cv-01604

Your Honor,

This firm represents the Plaintiffs in the above-referenced matter and writes with regard to the Initial Conference scheduled for May 20, 2021. Firstly, we would like to apologize for our failure to appear at the previously scheduled conference. This oversight was the result of a calendaring error. No disrespect to the Court was intended.

Plaintiffs respectfully request an adjournment of the Initial Conference until a date after May 28, 2021. The reason for this request is that the Plaintiffs served defendants Famous Pizza of Jackson Heights Corp. et al and Elmhurst Famous Pizza Corp. on May 7, 2021 (see ECF Doc. Nos. 9-10). They thus have until May 28, 2021 to answer or otherwise respond. We are not in contact with the Defendants or their counsel. An extension until after this date will allow the defendants time to appear, and for the parties to confer, and submit a proposed schedule pursuant to the Court's rules. This is the first request of its kind.

The Plaintiffs additionally request this adjournment due to scheduling conflicts for the attorneys of record in this case.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/Clela Errington  
Clela A. Errington, Esq.  
MICHAEL FAILLACE & ASSOCIATES, P.C.  
Attorneys for the Plaintiffs